

LAMPHIER-GREGORY

TECHNICAL MEMORANDUM

PREPARED FOR: Billy Gross

City of South San Francisco

Department of Economic and Community Development

315 Maple Avenue

South San Francisco, CA 94080

PREPARED BY: Rebecca (Gorton) Auld

Lamphier-Gregory, Inc.

1944 Embarcadero, Oakland, CA 94606

SUBJECT: Assessment of the 178-190 Airport Blvd Billboard Project

Under the IS/MND for 101 Terminal Court Clear Channel

Billboard Project and Related Zoning Amendment

DATE: June 1, 2017

Background and Purpose

The 101 Terminal Court Clear Channel Billboard Project and Related Zoning Amendment project was analyzed in an Initial Study/Mitigated Negative Declaration (IS/MND) with State Clearinghouse Number 2013062062 circulated in June 2013and adopted in August 2015. The proposed Zoning Amendment analyzed in the IS/MND would allow up to three digital billboards in a section of South San Francisco west of US 101, with the billboard proposed at 101 Terminal Court being the first of the three.

Action Signs has submitted a proposal for a digital billboard at 178-190 Airport Boulevard (including removal of an existing nearby static sign) within the area covered by the previous IS/MND. The existing static billboard at the site would be moved to make way for separate redevelopment of the site. The replacement billboard would be located about 40 feet further north than the existing sign, would be digital rather than static, and would be taller at 114'to maintain visibility from U.S. 101 given the proposed redevelopment of the site. The proposed height is taller than both the existing sign (90') and that assessed in the IS/MND (up to 70'). The proposed billboard would be a V-shape with two sign faces oriented to the two directions of traffic on U.S. 101. As with the existing billboard and those assessed in the IS/MND, the sign faces are 14' x 48'. The existing and proposed billboard locations and proposed billboard design are shown in Attachment A.

The purpose of this memo is to assess whether the proposed project has been covered under the IS/MND or whether subsequent analysis is required. The California Environmental Quality Act (CEQA) Guidelines Section 15162 provides the following guidance:

(a) When an EIR has been certified or a Negative Declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

Assessment

Up to two additional digital billboards to the west of U.S. 101 between Sister Cities Boulevard and the City's southern boundary were allowed by the Zoning Amendment and analyzed in the IS/MND. The current project site is within this area and is currently developed with commercial buildings and a gravel lot adjacent to railroad tracks and U.S. 101. The current project site is consistent with the type of lots covered by the assessed Zoning Amendment and would not represent unique site-specific environmental concerns beyond the analysis in the IS/MND.

No substantial changes have occurred to the circumstances in the area that would change conclusions of the IS/MND relative to construction of up to three digital billboards as anticipated. There have also been no substantial changes in digital billboard technology or scientific understanding of digital billboards that could be considered new information leading to changes in IS/MND conclusions. Therefore, this assessment focuses on the first criterion under CEQA Guidelines Section 15162: whether the changes in the project would result in new significant effects or substantially increased severity of significant effects.

The only substantial change from the IS/MND is the proposed taller height. The location proposed is within the area analyzed and the size of the sign faces are the same as those analyzed in the IS/MND.

Because the changes in the project are limited to height of the billboard, impacts under most environmental topics would remain unchanged. While construction activities could span a slightly longer period for a taller sign, it remains a relatively short construction period at an estimated 14 days and conclusions related to construction would not be substantially changed. The conclusions in the environmental topic area of Aesthetics have the potential to change with the changed height so are assessed in more detail below. For reference, the analysis of Aesthetics was included on pages 22 through 31 of the IS/MND.

Scenic Highways and Visual Character

There would be no substantial change to the assessment or conclusions related to Scenic Highways or visual character. The location (and therefore character of the area) has not changed, and the nearby segment of U.S. 101 is not a designated or eligible state scenic highway.

Scenic Vistas

The only scenic vista with the potential to be affected by the project is Sign Hill, which contains the prominent concrete "South San Francisco The Industrial City" sign on the hillside, and is identified as a national historic landmark and regional landmark. The IS/MND (page 22) characterizes the effect of the project on views of Sign Hill from U.S. 101 as follows:

The proposed billboard would contribute to blockage of views toward Sign Hill from the point of view of a vehicle driving north along U.S. 101. This interruption of views would be temporary in that the billboard would only block views for a short period as the vehicle progresses toward the billboard. Signs in this area are not uncommon though cumulative blockage of views would be intermittent, as views toward Sign Hill would be available between signs as a vehicle progresses north.

The conclusion related to scenic vistas in the IS/MND (page 29) reads as follows:

Taking both the regulatory and specific locational/scenic context into account, as well as the temporary and intermittent nature of the obstruction from the point of view of a moving vehicle, the Project's impact on scenic vistas, including views of Sign Hill from U.S. 101, would be considered a less than significant impact.

The proposed height of 114' would result in intermittent blockage of views toward Sign Hill from U.S. 101 that would be similar to those occurring today due to the 90' tall billboard to be removed as part of the current project. The existing condition is shown in the figure on the following page. Increasing the height to 114' would result in blockage of views of Sign Hill similar to those under the current condition. While changes in height (either from the existing 90' or the 70' analyzed in the IS/MND) would change the exact locations from which views of Sign Hill could be blocked as vehicles travel along U.S. 101, the currently proposed 114' height would not substantially change the assessment or conclusions related to scenic vistas. The impact related to Scenic Vistas would remain less-than-significant with the increased billboard height.

Light and Glare

The IS/MND (page 30) characterizes the effect of the project on light and glare as follows:

Digital billboards rely on LED technology to display messages on a lit screen. The lighting is designed to make the message displays visible to passing motorists.

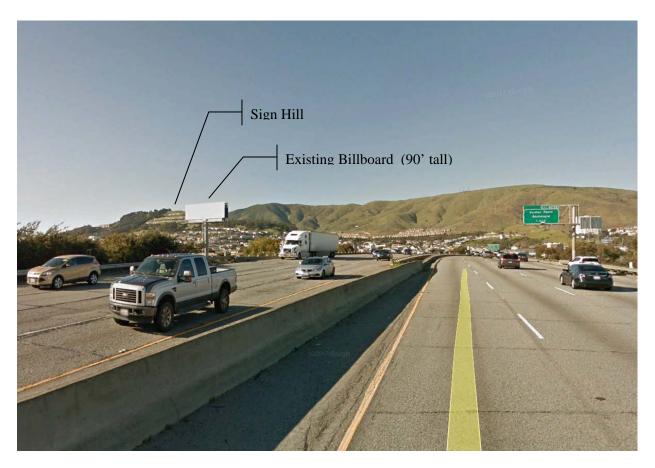


Figure 1: U.S. 101 Northbound View Toward Existing Billboard and Sign Hill. Source: GoogleEarth, with notations added.

The brightness of the LED display on the billboard face is subject to adjustment based on ambient conditions monitored by multiple light sensors. The display, for example, is brighter in the daytime than in darkness, and responds to changes in the ambient light conditions. Restrictions on digital billboards, imposed and enforced by Caltrans, preclude lighting that would be directed at motorists that is so directed or intense that it could blind or confuse drivers, or create conditions that make recognition of the roadway or official signage difficult.

Caltrans has imposed these restrictions for traffic safety reasons, and they are discussed in more detail in the Transportation section. The resulting controls, however, effectively regulate light and glare to ensure that the operation of any digital billboard does not create a substantial new source of light or glare.

The billboards would also comply with guidelines of the Outdoor Advertising Association of America (OAAA). These guidelines specify that lighting levels from a digital billboard will not exceed 0.3 footcandles over ambient levels, as measured using a footcandle meter at a pre-set distance based on the size of the billboard face. For the 14' by 48' billboards, this would be 250 feet. It is anticipated that the illuminance would be negligible beyond 500 feet.

Mitigation Measure Visual-1 was applied to require field testing to demonstrate compliance with specified brightness levels and would remain applicable to the proposed project. The sign faces would remain the size specified in the IS/MND and the light levels would be verified to remain within applicable guideline levels and there would be no change in IS/MND conclusions related to light and glare.

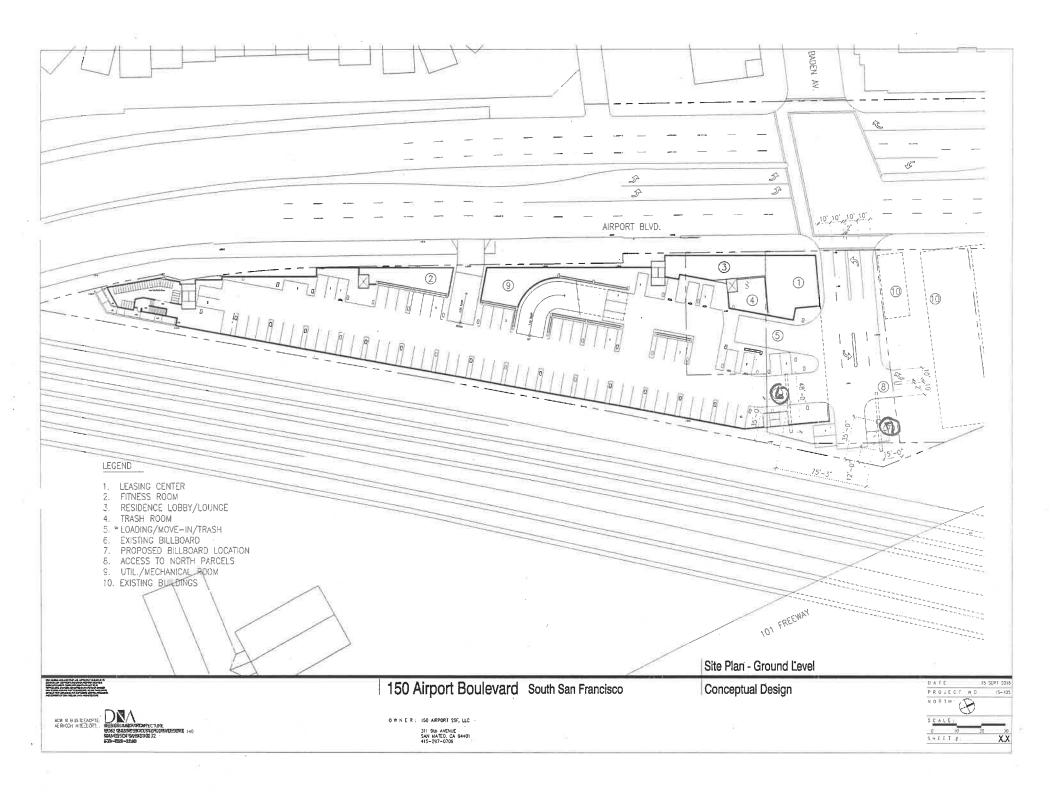
Conclusions

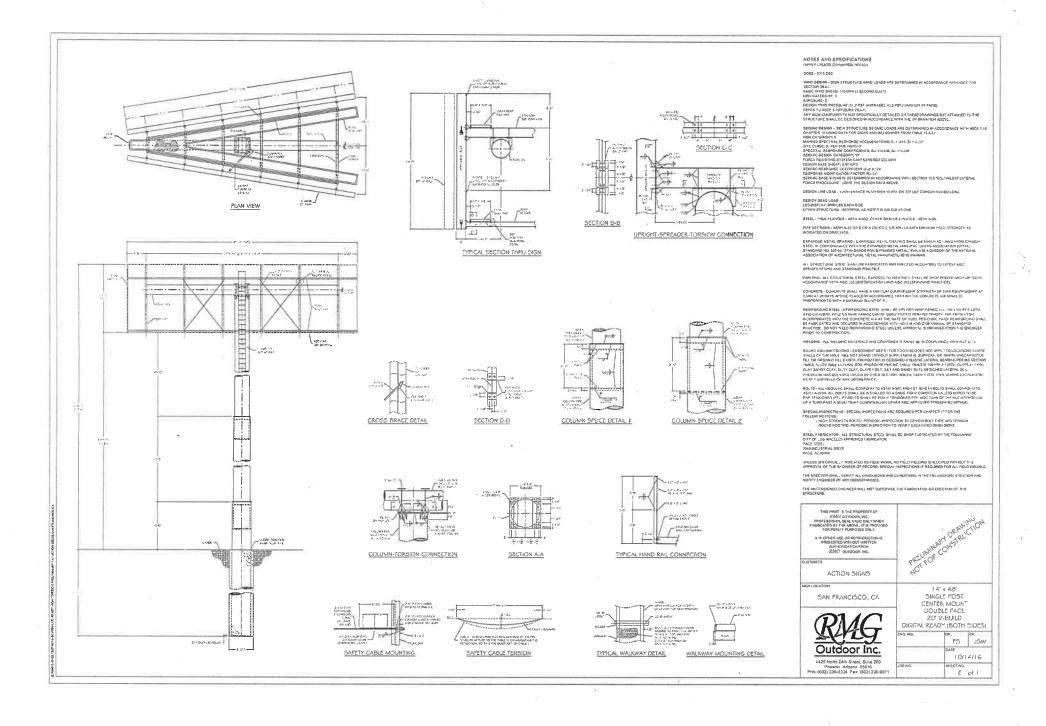
Therefore, given the substantial evidence above, the currently proposed digital billboard project at 178-190 Airport Boulevard would not require subsequent analysis to the IS/MND per CEQA Guidelines Section 15162, as confirmed by the following statements:

- (1) The current project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) There are no changes in circumstances that would result in the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) There is no new information resulting in a new significant effect not discussed in new significant environmental effects, a substantial increase in the severity of previously identified significant effects, or a change in the feasibility (or acceptance) of mitigation measures.

While changes to the project have occurred after adoption of the IS/MND (being the increased height to 114' from the analyzed 70'), this assessment has determined that no further documentation is required per CEQA Guidelines Section 15162. The IS/MND adopted in 2015 continues to serve as the applicable environmental review document pursuant to the requirements of CEQA for approval of the currently proposed digital billboard project at 178-190 Airport Boulevard and the measures in the adopted Mitigation Monitoring and Reporting Program (MMRP) would fully apply. The MMRP is included in Attachment B.

Appendix A Site Plan and Design





Appendix B Mitigation Monitoring and Reporting Program

MITIGATION MONITORING AND REPORTING PROGRAM

101 Terminal Court Clear Channel Billboard Project and Related Zoning Amendment, City of South San Francisco

This Mitigation Monitoring and Reporting Program (MMRP) was prepared based on the findings of the Initial Study and Mitigated Negative Declaration (IS/MND) for the Project, which was circulated in June 2013. This MMRP is in compliance with Section 15097 of the CEQA Guidelines, which requires that the Lead Agency "adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects." The MMRP lists mitigation measures recommended in the IS/MND and identifies mitigation monitoring requirements, including implementation timing and responsibility as well as monitoring responsibility and actions.

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification			
			Monitoring Action	Monitoring Responsibility	Date Completed	
Visual-1: Billboard Brightness Field Testing. The Applicant shall demonstrate through field testing compliance with a 0.3 footcandle increase over ambient light at 250 feet during nighttime conditions upon initial start-up, at 6 months of operation and at the request of the City for the life of the billboard. The Applicant shall fund field testing by an independent contractor or City staff trained in the use of a handheld photometer to demonstrate continued compliance. The City shall consider citizen complaints consisting of direct personal impacts as cause for requesting field testing. If increases in ambient light are found to be above the 0.3 footcandle level, the dimming level shall be adjusted until this level can be demonstrated. This must be completed and demonstrated through follow-up field testing within 24 hours or the billboard shall not be operated until the lighting levels can be brought into compliance. If no above-threshold levels have been measured in the prior three tests, field testing shall be requested no more often than twice yearly. Otherwise, field tests can be requested up to once monthly.	Prior to operations then per the conditions indicated.	Applicant, as coordinated by City	Review of field testing results by City	SSF Planning Division		
 Air-1: Basic Construction Management Practices. The Project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD "Basic Construction Mitigation Measures". i. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. ii. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 	Prior to issuance of building permits and during construction	Applicant, specifically the construction contractor	Verify requirements are included in construction contracts and met during construction	SSF Building Division		

		T		Verification			
Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Monitoring Action	Monitoring Responsibility	Date Completed		
iii.	All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.						
iv.	All vehicle speeds on unpaved roads shall be limited to 15 mph.						
v.	All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.						
vi.	Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.						
vii.	All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.						
viii.	Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.						
Proje cultu	aral-1: Cultural Monitoring and Mitigation Plan. The ct applicant shall fund preparation and implementation of a ral monitoring and mitigation plan by a qualified eologist to address the potential for presence and disturbance	During construction	Applicant	Halt construction if resources are found and	SSF Building Division		

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification			
			Monitoring Action	Monitoring Responsibility	Date Completed	
of Native American archaeological resources or remains during excavation of the billboard pole footing. This will include at a minimum monitoring during excavation of the billboard pole footing and may also include but is not limited to additional archival research, hand auger sampling, shovel test units, geoarchaeological analysis, or other common methods used to identify the presence of archaeological resources to be determined per the recommendation of the qualified archaeologist. The archaeologist and construction contractors shall follow the appropriate procedures should any cultural resources or human remains be discovered during ground disturbance.			coordinate with the appropriate authority or professional			
Haz-1: Phase I and/or Phase II Reports. Prior to issuance of construction permits, the City of South San Francisco shall require the Project applicant to submit a Phase I environmental site assessment report, and a Phase II report if warranted by the Phase I report for the Project site. The reports shall make recommendations for remedial action in accordance with State and Federal laws, if appropriate, and should be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. The Applicant shall comply with these recommendations.	Prior to issuance of building permits, if requested by the City	Applicant	Review of reports by City and, if applicable, verification of recommended measures in construction contracts	SSF Building Division		
Haz-2: E-Waste Disposal. Electronic components of the billboard may contain materials considered "e-waste" when disposed of due to potentially hazardous metals, flame retardants, and other chemicals. The operator shall be required to follow applicable regulations regarding proper disposal and/or recycling, as appropriate, as components are replaced or removed over time.	Ongoing during operations	Applicant	None by the City	Applicable regulatory agencies and/or disposal companies		

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification			
			Monitoring Action	Monitoring Responsibility	Date Completed	
Traf-1: Annual Report. The operator of the digital billboard shall submit to the City, within thirty days following June 30 of each year, a written report regarding operation of each digital billboard during the preceding period of July 1 to June 30. The operator may submit a combined report for all such digital billboards operated by such operator within the City limits. The report shall, when appropriate, identify incidents or facts that relate to specific digital billboards. The report shall be submitted to the Director of the Economic and Community Development Department and shall include information relating to the following: a. Status of the operator's license as required by California Business and Professions Code §\$5300 et seq.; b. Status of the required permit for individual digital billboards, as required by California Business and Professions Code §\$5350 et seq.; c. Compliance with the California Outdoor Advertising Act, California Business and Professions Code §\$5200 and all regulations adopted pursuant to such Act; d. Compliance with California Vehicle Code §\$21466.5 and 21467; e. Compliance with provisions of written agreements between the U.S. Department of Transportation and the California Department of Transportation pursuant to the federal Highway Beautification Act (23 U.S.C. §131); f. Compliance with mitigation measures identified in the Mitigated Negative Declaration adopted as part of Project approval; g. Each written or oral complaint received by the operator, or conveyed to the operator by any government agency or any other person, regarding operation of each digital billboard included in the report;	Annually during operations	Applicant / Operator	Review of Annual Report	SSF Planning Division		

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification			
			Monitoring Action	Monitoring Responsibility	Date Completed	
 h. Each malfunction or failure of each digital billboard included in the report, which shall include only those malfunctions or failures that are visible to the naked eye, including reason for the malfunction, duration and confirmation of repair; and i. Operating status of each digital billboard included in the report, including estimated date of repair and return to normal operation of any digital billboard identified in the report as not operating in normal mode. 						
 Traf-2: Operational Safety. The operation of the digital billboard shall comply with the following at all times: a. No special visual effects that include moving or flashing lights shall accompany any message or the transition between two successive messages; b. The operator shall not install or implement any technology that would allow interaction with drivers, vehicles or any device located in vehicles, including, but not limited to a radio frequency identification device, geographic positions system, or other device without prior approval of the City of South San Francisco, taking into consideration technical studies and CalTrans or US DOT policies and guidance available at the time of the request. 	Ongoing during operations	Applicant / Operator	Included in Review of Annual Report	SSF Planning Division		